

LAW OFFICE OF  
ZACHARY MARGULIS-OHNUMA

August 4, 2020

Via ECF

Hon. Laura Taylor Swain  
U.S. District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

MEMO ENDORSED

RE: U.S. v. Sergio Medrano, 06 Cr. 61

Dear Judge Swain:

This office represents the defendant Sergio Medrano with respect to his pending motion for a sentence reduction pursuant to the 2014 amendments to the U.S. Sentencing Guidelines, which retroactively reduce the Guidelines sentences for most drug offenses. I write, with the consent of the Government, to request until October 9, 2020, to respond in full to the Government's submission filed yesterday.

Pursuant to the Court's order dated July 2, 2020, the Government submitted a letter conceding that Mr. Medrano is eligible for a reduction of his nearly 22-year sentence, but arguing in great detail that the Court in its discretion should deny any form of relief. Under the Court's order, Mr. Medrano has until August 17 to "file his position on a modification of his sentence[.]"

Mr. Medrano wishes to proceed with his application for a reduction in his sentence to 235 months. Although it seems self-evident to me that even this reduced sentence is appallingly long for a first-time, non-violent drug offender, I would like an opportunity to review the allegations in the Government's letter with Mr. Medrano and, if necessary, to investigate them independently. I am currently on a family vacation, returning to the office on August 14, 2020. Due to the need to review and investigate the Government's assertions and the difficulty in communicating with Mr. Medrano (who is incarcerated in a private facility in Pennsylvania), I request until October 9, 2020, to respond fully to the Government's submission.

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I have communicated with AUSA Michael Maimin and he advises that the Government consents to this request. There has been no prior request for an adjournment of this deadline.

Very truly yours,

*Zachary Margulis-Ohnuma*

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CC: AUSA Michael Maimin (via ECF and email

The requested adjournment of the deadline to October 9, 2020, is granted. DE# 129 resolved.

SO ORDERED.

8/4/2020

/s/ Laura Taylor Swain, USDJ